

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

MARQUES GREEN and KELVIN MOORE,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 07 C 50219
	)	
DEBORAH PETERSON and DAVID	)	Judge Philip G. Reinhard
PETERSON,	)	
	)	Magistrate Judge P. Michael Mahoney
Defendants.	)	

**PARTIES' PROPOSED CASE MANAGEMENT ORDER**

I. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held by telephonic and/or electronic means and was attended by:

Donald Nathan for Plaintiffs;

James P. Devine for Defendants.

II. The Fed. R. Civ. P. 26(a)(1) material will be exchanged by June 1, 2008.

III. Alternative Dispute Resolution Mediation. Counsels hereby certify that their respective clients have read the Pamphlet governing the court's mediation program, that counsels have discussed with their respective clients the available dispute resolution options provided by the court and private entities, and that counsels have given an estimation of the fees and costs that would be associated with the litigation of this matter, through trial, to their clients. Further, counsels have provided to their clients an estimate of the fees and expenses reasonably expected to be incurred through an early successful mediation. Counsels certify that they have discussed the available ADR options with their clients and have considered how this case might benefit from those options. Lastly, if this is a fee shifting case, defense counsels certify they have discussed the advantages and disadvantages of making a Rule 68 offer of judgment.

The parties request this case be excused from ADR.

IV. Discovery Plan. The parties jointly propose to the court the following discovery plan:

A) Discovery will be needed on the following subjects:

Liability of each defendant and damages.

- B) Maximum of 30 interrogatories by each party to any other party.
- C) Maximum of 30 requests for admission by each party to any other party.
- D) Maximum of 10 depositions by Plaintiffs and 10 by Defendants.
- E) Each deposition shall be limited to a maximum of 3 hours.
- F) Fact discovery cut-off is set for November 3, 2008.
- G) Rule 26(a)(2) discovery is reserved.
- H) Final discovery cut-off is reserved.
- I) Time for the parties to amend pleadings and add counts or parties is hereby established as September 2, 2008.
- J) The parties suggest the next discovery conference with the court be August 8, 2008.

All dispositive motions will be due December 1, 2008. The parties agree pleadings, motions and briefs may be exchanged by e-mail, fax or other electronic means.

Entered: \_\_\_\_\_

\_\_\_\_\_  
Magistrate P. Michael Mahoney